

- TARIQ SHAUKAT -

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK
----- X
ULKU ROWE,

Plaintiff,

Case No.
19 Civ. 08655 (LGS) (GWG)

v.

GOOGLE LLC

Defendant.

----- X
DATE: October 15, 2020

TIME: 9:34 a.m.

VIDEOTAPED VIDEOCONFERENCE DEPOSITION
OF TARIQ SHAUKAT, held via Zoom, pursuant to
Notice, before Hope Menaker, a Shorthand Reporter
and Notary Public of the State of New York.

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2 Q. So you learned of it sometime around
3 the time of its filing; is that correct?

4 A. Yes.

5 Q. And what is your understanding of
6 what this lawsuit is about?

7 A. My general understanding is it's in
8 relation to the role of head of financial services
9 in Google Cloud.

10 I apologize, the gardener just showed
11 up. Let me shut the door here. You may not be
12 able to hear, my apologies.

13 My understanding is it's in relation
14 to her applications for the head of financial
15 services for Google Cloud and the fact that she
16 did not get that role.

17 Q. Anything else that you understand
18 about the claims that she's asserted in this case?

19 A. Not specifically to this case, no. I
20 have not reviewed, as I mentioned, the -- the
21 Complaint.

22 Q. What's your understanding of how you
23 relate to this lawsuit?

24 A. I was hiring manager for that
25 position and so that's my -- my understanding as

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2 to what -- my relationship.

3 Q. How old are you, Mr. Shaukat?

4 A. I'm [REDACTED].

5 Q. And what is your highest level of
6 education?

7 A. I have two Master's degrees; one in
8 mechanical engineering and the other in public
9 policy.

10 Q. And when did you graduate with your
11 second Master's?

12 A. That would be early 1997, either
13 January or February.

14 Q. And when -- and which Master's degree
15 was that?

16 A. That was the public policy degree.

17 Q. And when did you get your mechanical
18 engineering Master's?

19 A. 1995, June of 1995.

20 Q. And so did you go immediately from
21 your Master's in mechanical engineering to pursue
22 your Master's of public policy?

23 A. I did, yes.

24 Q. And when did you receive your
25 undergraduate degree?

<p style="text-align: right;">Page 42</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 contemplated or discussed or organ -- organizing</p> <p>3 by industry?</p> <p>4 A. One of the first initiatives that I</p> <p>5 kicked off when I joined was a reorganization of</p> <p>6 those teams so that we could have an integrated</p> <p>7 go-to-market team, as we thought of it, as opposed</p> <p>8 to what I inherited was a series of product silos.</p> <p>9 We had a G-suite team, we had a</p> <p>10 Google Cloud team, an Android For Work team, et</p> <p>11 cetera and so the initial -- well, one of the</p> <p>12 initial efforts that I launched was a</p> <p>13 reorganization and part of that was an</p> <p>14 organizational design exercise in which we did</p> <p>15 contemplate forming industry-specific teams. This</p> <p>16 would have been in 2016, and we decided to have</p> <p>17 that in the terminology we used as a minor, not a</p> <p>18 major. We decided that the major would be</p> <p>19 regional and the industry would be the minor.</p> <p>20 Q. Okay. Are you familiar with the term</p> <p>21 "verticals" as it was used at Google? Are you</p> <p>22 familiar with the term "verticals" as that term</p> <p>23 was used at Google?</p> <p>24 A. I am, yes.</p> <p>25 Q. And what do you understand that term</p>	<p style="text-align: right;">Page 44</p> <p style="text-align: center;">Page not submitted in support of Google's motion for summary judgment</p>
<p style="text-align: right;">Page 43</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 to mean?</p> <p>3 A. Within Google Cloud it generally</p> <p>4 refers to industries.</p> <p>5 Q. And are you familiar with the term</p> <p>6 "verticalization"?</p> <p>7 A. I am, yes.</p> <p>8 Q. And what does that refer to?</p> <p>9 A. Again, within Google Cloud we refer</p> <p>10 to it as -- we use that term to talk about</p> <p>11 organizing by vertical.</p> <p>12 Q. So at the time you joined at Google</p> <p>13 Cloud, was it in any way organized by verticals?</p> <p>14 A. Honestly I don't recall specifically</p> <p>15 the details, but there were some teams in some of</p> <p>16 the product areas that I mentioned that did focus</p> <p>17 on a particular vertical. I don't recall if they</p> <p>18 were specifically organized by vertical, but there</p> <p>19 were certain individuals with a vertical focus.</p> <p>20 Q. At the time you joined Google, was</p> <p>21 there a financial services vertical?</p> <p>22 A. At the time I joined there were</p> <p>23 individuals who focused on financial services. We</p> <p>24 did not have a formal designation of there being a</p> <p>25 vertical at that time, that -- that I know of</p>	<p style="text-align: right;">Page 45</p> <p style="text-align: center;">Page not submitted in support of Google's motion for summary judgment</p>

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Q. And what about Mr. Breslow's
background made him an ideal candidate for
that -- for that role?

A. Stuart had been a longtime chief
compliance officer to highly-respected
financial institutions in the field of compliance
specifically, so Morgan Stanley and then Credit
Suisse.

Before that he also had been a
partner, subsequent to those experiences, at
McKinsey focusing specifically on topics such as
anti-money laundering, which was a very
high-interest area for us from a product
standpoint as well and so he -- and so he had both
the -- and he had published a paper, I recall is
the way we found him, on anti-money laundering
that was quite influential on how we were thinking
about the anti-money laundering space.

Q. Didn't he actually come to be known
to Google through Ruth Porat?

A. He did not, no. At least, not to my
knowledge. I -- I -- Ruth was not the person who
identified him to me.

Q. And so you're not aware that he was

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 2 internal communications team that wrote them and I
 3 sent them after reviewing them.

4 Q. Was this consistent with your
 5 understanding of his background?

6 A. Generally speaking, yes.

7 Q. Okay, you can put that aside.
 8 How did it come to be that Ms. Rowe
 9 was moved into your organization?

10 A. So there were always -- since the
 11 hiring, which as I mentioned was unexpected for me
 12 of these vertical specific people in OCTO, there
 13 was always -- or there -- there was a level of
 14 conflict and misalignment that -- that existed and
 15 kept getting called to light by either customers
 16 or by our teams, and in my role that would be the
 17 sales and go-to-market teams; and so there was an
 18 ongoing discussion that existed for quite a while.
 19 I don't recall the exact length of time, but
 20 almost from the -- the earliest days of these
 21 industry-specific people being in OCTO about the
 22 conflict, how do we resolve the conflict.

23 Will, Brian, and I tried a number of
 24 different avenues to try and resolve the conflicts
 25 that existed and at some point in late 2017 after

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 2 the reorganization I mentioned with me taking over
 3 the industry teams, we decided -- "we" being Diane
 4 Greene, myself and Brian -- to move the
 5 vertical-specific OCTO people into the vertical
 6 teams so that we were building. And so that was
 7 the decision that we made, again, late '17/early
 8 '18 and it then took a little while for us to work
 9 out the details and -- and figure out how to do
 10 it, what the roles were, et cetera.

11 Q. And so with respect to the OCTO
 12 vertical folks, was the agreement that if
 13 they -- they would move over into your
 14 organization?

15 A. That was the agreement that I had
 16 with Brian Stevens and Diane Greene, yes.

17 Q. And that they could either have a
 18 team to lead or they could continue in a -- in a
 19 tech advisor-type role --

20 MR. GAGE: Objection.

21 Q. -- correct.

22 A. That is not correct. The idea was
 23 that they would move into a role that we were
 24 calling the Global Client Technical Lead Role and
 25 that they would build out a team there to do that.

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2 a.m. and we're going off the record.

3 (Whereupon, there was a brief recess

4 in the proceedings.)

5 THE VIDEOGRAPHER: The time is 11:56

6 a.m. and we're back on the record.

7 Q. So before we broke, you were telling

8 me about a conversation that you had with Ms. Rowe

9 regarding her move into the -- into your

10 organizational unit and you said it would have

11 been somewhere in the 30 to 60- minute range. Do

12 you recall whether you were physically present

13 together or whether there was some other mode of

14 communication?

15 A. I don't recall specifically. We

16 had -- we were based in different offices so, it

17 would not be atypical for it to have been

18 videoconference.

19 Q. Where were you based?

20 A. In Sunnyvale, California.

21 Q. Okay, and can you tell me everything

22 that you recall being said in that conversation?

23 A. I recall walking her through

24 basically what the content of the note that I

25 subsequently sent out was describing, the

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2 organizational structure that we had in place. So

3 I described that we were standing up a group that

4 we called the Global Client Lead Group and that

5 that team would be focused on the business and

6 business development and -- but dedicated to a

7 specific list of clients that we called the Global

8 Client List; and that we were also setting up a

9 team that we called the Global Client Technical

10 Lead Team and that that team would be peers of the

11 GCLs, as we referred to them Global Client Lead,

12 but focused more on the technical aspect. I

13 explained that these would be focused on the

14 priority list of clients that we would be

15 developing. By "we" I mean myself, the sales

16 leadership, and Diane would be developing.

17 We would assign a list to each of the

18 GCLs and the GCTLs, the again Global Client

19 Leads and the Global Client Technical Leads, and

20 that -- and that those individuals would be

21 expected to really be the sponsors and actively

22 engaged in what I call the persistent manner in

23 those different accounts. So there was a -- a

24 discussion about that. Those were both new

25 functions or new characterizations and new

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2 designations that we had and so I walked her

3 through that.

4 I walked her through what the other

5 roles in the industry were going to be; meaning we

6 had a product lead, we had an engineering lead, we

7 had an industry lead, and dotted-line marketing

8 lead, and I think that's it. And so I recall

9 us -- me laying that out for her, explaining what

10 the role would be, explaining that her role would

11 be to come in and do the global client technical

12 lead, that this would look and feel and roles and

13 responsibilities would be broadly in line with

14 what she had been expected to be doing inside of

15 OCTO with the possible exception that there would

16 be a designated or a -- a specified list of

17 clients that she was personally responsible for

18 managing.

19 That had been the practice that Will

20 Grannis and I had with OCTO historically, but I

21 don't know in -- in the conversations Ulku

22 expressed surprise, surprised that she would be

23 restricted to a certain number of accounts, that

24 she would be asked to focus on a specific list of

25 accounts, which led me to believe that possibly

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2 Will did not manage it in the way that he and I

3 had agreed that he would manage the -- the team.

4 Q. Do you recall anything she said to

5 you that you've not shared so far?

6 A. A couple of things. One was the

7 surprise, as I mentioned. A lot of clarification

8 about why the specifics to specific accounts, what

9 account would they be. I told her that they were

10 still in -- a work in process, but they would be

11 kind of the who's who of the financial services

12 world, our top target accounts. So she expressed

13 surprise about that.

14 She expressed some -- dislike is

15 probably the right way to -- to say it, that she

16 was not happy with that focus that I was asking

17 for on specific global -- on specific accounts and

18 the persistent nature of the relationship. She

19 was very keen to understand the relationship

20 between the global client lead and the global

21 client technical lead and -- and the type of

22 person we would be hiring into each one of those.

23 She was very curious as to whether

24 she would be asked to build out a team or not or

25 the global client lead and I did explain to her

<p style="text-align: right;">Page 98</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 that this is -- we are expecting her to come in</p> <p>3 and build a team and lead a team of global client</p> <p>4 leads, but this was what I called the Player Coach</p> <p>5 Role, right, where she would both manage a team,</p> <p>6 but also be expected to have a certain number of</p> <p>7 accounts that she was personally responsible and</p> <p>8 accountable for.</p> <p>9 Q. And so at the time you had this</p> <p>10 conversation with her, you had already had the</p> <p>11 conversation where HR had shared with you</p> <p>12 background information of her level, correct?</p> <p>13 A. Yes, that would be true.</p> <p>14 Q. Anything else you recall her saying</p> <p>15 to you in this conversation?</p> <p>16 A. Not really except, as I mentioned,</p> <p>17 she expressed her displeasure. I think she said,</p> <p>18 I have go away and think about this and I may have</p> <p>19 more questions. Or at least that's my</p> <p>20 recollection, that she said something to that</p> <p>21 effect.</p> <p>22 Q. Was there any discussion with respect</p> <p>23 to the VP of financial services role in this</p> <p>24 conversation?</p> <p>25 A. Not that I recall.</p>	<p style="text-align: right;">Page 100</p> <p style="text-align: center;">Page not submitted in support of Google's motion for summary judgment</p>
<p style="text-align: right;">Page 99</p> <p style="text-align: center;">Page not submitted in support of Google's motion for summary judgment</p>	<p style="text-align: right;">Page 101</p> <p style="text-align: center;">Page not submitted in support of Google's motion for summary judgment</p>

<p style="text-align: right;">Page 102</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 MR. GAGE: Objection.</p> <p>3 A. I know we didn't have any finalists,</p> <p>4 but apart from that I don't recall the status.</p> <p>5 Q. Okay. You say in your proposed</p> <p>6 response to her, "I'm happy" -- and I'm looking</p> <p>7 now at the first page on your response, the first</p> <p>8 paragraph toward the end. You say, "I'm happy to</p> <p>9 have you lead the team if you would like to do</p> <p>10 that as well. So recognize your current role is</p> <p>11 an IC role, but if you prefer not to do that we</p> <p>12 can certainly adjust." Do you see that?</p> <p>13 A. I do, yes.</p> <p>14 Q. Does "IC" refer to individual</p> <p>15 contributor?</p> <p>16 A. Yes.</p> <p>17 Q. And so am I correct that you were</p> <p>18 indicating that her role could either be an IC or</p> <p>19 a manager role under you?</p> <p>20 A. If -- if she expressed a preference</p> <p>21 that -- but my preference was that she would lead</p> <p>22 the team and if she expressed a preference to</p> <p>23 maintain her individual contributor status which</p> <p>24 is what she had been, then I was happy to discuss</p> <p>25 and adjust.</p>	<p style="text-align: right;">Page 104</p> <p style="text-align: center;">Page not submitted in support of Google's motion for summary judgment</p>
<p style="text-align: right;">Page 103</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 Q. And is that what happened, did she</p> <p>3 maintain the IC or did she become a manager?</p> <p>4 A. Honestly, as you can see from her</p> <p>5 e-mail, she declined the role which led us to a</p> <p>6 fairly ambiguous state, which technically I was</p> <p>7 confused as to whether she actually resigned as I</p> <p>8 mentioned in my -- in my notes here.</p> <p>9 And so when -- but we ended up not</p> <p>10 building out this team in any level of detail and</p> <p>11 so she was in IC simply because she didn't hire</p> <p>12 anyone on the team, but not by design at that</p> <p>13 point; but that specific point I don't recall her</p> <p>14 responding with yes, I would like to manage the</p> <p>15 team. Instead, as -- as you saw, she responded</p> <p>16 with I decline the role which was much more</p> <p>17 ambiguous.</p> <p>18 Q. Well, let's go back to the Box and,</p> <p>19 again, you may need to refresh and we're going to</p> <p>20 look at Tab 25.</p> <p>21 A. Yes, I have it.</p> <p>22 Q. Okay.</p> <p>23 MS. GREENE: We're going to mark</p> <p>24 this as Exhibit 30. It has a Bates stamp of</p> <p>25 GO -- GOOG-ROWE-P-00000726 through 727.</p>	<p style="text-align: right;">Page 105</p> <p style="text-align: center;">Page not submitted in support of Google's motion for summary judgment</p>

<p style="text-align: right;">Page 146</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 in a Google Doc or other some other form. I</p> <p>3 just -- I don't know what his practice was. I</p> <p>4 know what he showed me, which was -- and the</p> <p>5 discussion that we had.</p> <p>6 Q. Particularly with respect to Jason?</p> <p>7 A. No, in -- in general.</p> <p>8 Q. Okay. What do you recall Stuart</p> <p>9 telling you about feedback he had gotten from</p> <p>10 Jason?</p> <p>11 A. I don't --</p> <p>12 MR. GAGE: Objection.</p> <p>13 A. Sorry.</p> <p>14 MR. GAGE: I said objection.</p> <p>15 A. I don't recall this -- I -- I recall</p> <p>16 the general feedback between Sebastien and Jason.</p> <p>17 I don't recall specially what came from Jason and</p> <p>18 what came from Sebastien. The general feedback</p> <p>19 was that they had a hard time understanding and</p> <p>20 getting Ulku to articulate a vision for the</p> <p>21 financial services industry, to articulate the</p> <p>22 business needs that she felt the industry was</p> <p>23 facing that Google Cloud could help with, and</p> <p>24 they -- they were unclear whether she would be</p> <p>25 able to lay out or she didn't demonstrate I guess</p>	<p style="text-align: right;">Page 148</p> <p style="text-align: center;">Page not submitted in support of Google's motion for summary judgment</p>
<p style="text-align: right;">Page 147</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 that she would be able to lay out a product</p> <p>3 mandate, for lack a better word, for the vertical.</p> <p>4 And so that was the consistent</p> <p>5 impression that I got from the interviews with</p> <p>6 Sebastien and Jason, but I don't remember</p> <p>7 specifically what each one of them said and I'm</p> <p>8 not sure I was ever told specifically what each</p> <p>9 one of them said.</p> <p>10 Q. So if you -- let's break this down.</p> <p>11 Who did you have conversations with regarding how</p> <p>12 Ms. Rowe's interviews went?</p> <p>13 MR. GAGE: Objection.</p> <p>14 A. So I had a standing weekly meeting</p> <p>15 with the leadership staffing team led by Stuart</p> <p>16 Vardaman. In that standing weekly meeting, Stuart</p> <p>17 would update me on the status of each of the</p> <p>18 candidates in the pipeline. He would do that by</p> <p>19 providing at least a verbal -- in some cases</p> <p>20 bullet pointed, but in some cases a verbal summary</p> <p>21 of the feedback that was provided from the</p> <p>22 interviewers; and in some cases -- in many cases</p> <p>23 he would say, I need your help chasing feedback</p> <p>24 because I haven't gotten it yet. People get busy</p> <p>25 and they don't necessarily send the e-mails that</p>	<p style="text-align: right;">Page 149</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 mentioned, she was one of many industry leads and</p> <p>3 senior hires we were trying to hire at the time</p> <p>4 or she was interviewing for one of the roles that</p> <p>5 we were -- in one of the many roles that we were</p> <p>6 interviewing for at the time. So I don't -- it --</p> <p>7 it would not have been unlikely. I can't tell you</p> <p>8 I didn't have a direct conversation with them, but</p> <p>9 I don't have a specific recollection of them</p> <p>10 sending me a Hangout message or a verbal</p> <p>11 conversation or anything like that.</p> <p>12 Jason's office and my office during</p> <p>13 this time were across the hall from each other, as</p> <p>14 an example, so we had casual conversations about</p> <p>15 business in my office or in his office quite</p> <p>16 frequently.</p> <p>17 Q. Okay. Do you recall specifically</p> <p>18 having a conversation with Stuart Vardaman</p> <p>19 regarding the feedback from the interviews with</p> <p>20 Ms. Rowe?</p> <p>21 MR. GAGE: Objection.</p> <p>22 A. As I just mentioned, I recall</p> <p>23 having -- I rec -- I recall in the standing</p> <p>24 meeting having Stuart tell me the feedback that</p> <p>25 had come through the initial round of interview</p>

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1 candidates, yes, and -- and including Ulku,
2 specific to Ulku, yes.

3 Q. And what do you recall him saying to
4 you specifically with respect to Ms. Rowe?

5 MR. GAGE: Objection.

6 A. So, as I -- as I just mentioned, he
7 said that the -- the interviews had happened. He
8 said that generally speaking people feel quite
9 comfortable with her technical capability, but
10 there were concerns around what I'll term
11 broadly as the -- as the business aspects of that;
12 meaning specifically her ability to articulate
13 a prop -- a vision for the industry, articulate
14 a value proposition for Google Cloud in the
15 industry that would be differentiated versus other
16 potential offerings in the industry that would be
17 translatable to a product level, which was really
18 one of the core things that we were solving for
19 was who could help us figure out what products to
20 build and how to position those in the market.
21 They did not see evidence, or they did not believe
22 I should say, coming out of the discussion that
23 Ulku demonstrated that she had the prod -- the
24 product vision or the ability to develop a product
25

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1 vision for the industry.

2 So there was no negative feedback.
3 There was only positive feedback on the technical
4 side and there were questions and concerns on the
5 nontechnical side, and I'll include product
6 management as the nontechnical in -- in that
7 description.
8

9 Q. Did Mr. Vardaman share with you from
10 where the feedback was coming, how he gathered
11 this feedback?

12 MR. GAGE: Objection.

13 A. I don't -- Stuart's normal expression
14 was I'm chasing everybody and here's what I got,
15 but I don't know in this case how he got the
16 feedback. I don't know what that would have
17 translated into in this case.

18 Q. When did he share that feedback with
19 you?

20 A. I -- it would have been the week or
21 two depending on when we met after that round of
22 interviews with Ulku, but I don't know even
23 roughly when that was. Yeah -- yeah, I don't know
24 when that was.

25 Q. Did he share with you that Vat liked

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1 A. It doesn't. I'm just trying to
2 remember. I have a very vague recollection of
3 telling Brian that several of the interviews
4 didn't go well, that there were some concerns
5 raised, but I can't -- but it's a very faint
6 recollection and I don't know, I -- I can't recall
7 anymore details about that conversation, but
8 that's the only one that's even vaguely coming to
9 mind.
10

11 Q. Give me just a moment.

12 Okay, I would like you to look in the
13 Box again and we're going to be looking at Tab 38.
14 We're going to mark it as Exhibit 35 and it has
15 the Bates stamp number GOOG-ROWE-00017533 through
16 38.

17 (Whereupon, Plaintiff's Exhibit 35
18 was marked at this time.)

19 Q. Do you recognize this document?

20 A. It appears to be an e-mail from me to
21 Sebastien Marotte.

22 Q. And is this the same Sebastien that
23 we have been discussing?

24 A. It is, yes.

25 Q. And do you see on Wednesday, August

<p style="text-align: right;">Page 162</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 was viable for the role?</p> <p>3 MR. GAGE: Objection, asked and</p> <p>4 answered.</p> <p>5 A. I -- again, I don't know the specific</p> <p>6 timing what my view was. I know that it would be</p> <p>7 after I received the feedback from Jason and</p> <p>8 Sebastien, but I don't know that feedback in</p> <p>9 relation to September 1st, 2018.</p> <p>10 Q. What do you recall with respect to</p> <p>11 Ms. Rowe interviewing with Diane Greene?</p> <p>12 A. Once we decided that Ulku was not</p> <p>13 going to be a finalist because of the interview</p> <p>14 feedback that we had received, I moved into</p> <p>15 retention mode because I did value Ulku and did</p> <p>16 want her to join the team and to make the</p> <p>17 transition that we had been trying to enact work;</p> <p>18 and I thought that having a courtesy meeting with</p> <p>19 Diane would be helpful in -- in assisting us in</p> <p>20 retaining Ulku.</p> <p>21 I suspected, and Ulku said at the</p> <p>22 time, that if she didn't get the -- the FSI Lead</p> <p>23 role that she would leave Google which is not an</p> <p>24 outcome that I wanted to see because, as the</p> <p>25 interviews noted, she was quite strong on the</p>	<p style="text-align: right;">Page 164</p> <p style="text-align: center;">Page not submitted in support of Google's motion for summary judgment</p>
<p style="text-align: right;">Page 163</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 technical side of things. So the -- the Diane</p> <p>3 meeting was meant to be part of an -- an attempt</p> <p>4 to make her comfortable and happy with the role</p> <p>5 that we did think she was a very good fit for.</p> <p>6 Q. Did you tell her it was an interview</p> <p>7 in connection with the VP of financial services</p> <p>8 role?</p> <p>9 A. The "her" in this case would be who?</p> <p>10 Q. Ulku.</p> <p>11 A. I don't know if I actually told Ulku</p> <p>12 anything, except that we would schedule a meeting</p> <p>13 with Diane. I'm not sure what -- what Stuart said</p> <p>14 to her about it, but -- and it's certainly the</p> <p>15 case that we did not close Ulku out at this point</p> <p>16 and tell her that we didn't think she was a</p> <p>17 finalist candidate in part. Because Brian did</p> <p>18 feel so strongly about it, I wanted her to meet</p> <p>19 Diane as I mentioned from a -- from a retention</p> <p>20 standpoint, but if Diane thought we had the wrong</p> <p>21 read on it that we might go back and take a look.</p> <p>22 So we definitely did not tell Ulku that she was</p> <p>23 not getting through to the next round as part of</p> <p>24 setting up the meeting with Diane.</p> <p>25 Q. Did Ulku tell you that she -- at the</p>	<p style="text-align: right;">Page 165</p> <p style="text-align: center;">Page not submitted in support of Google's motion for summary judgment</p>

<p style="text-align: right;">Page 202</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 p.m. and we're back on the record.</p> <p>3 Q. Mr. Shaukat, were -- the position</p> <p>4 that Ms. Rowe was brought in to into your</p> <p>5 organization, that was -- was that the global</p> <p>6 client lead role?</p> <p>7 A. I'm sorry, that she was brought into</p> <p>8 my organization or into the organization?</p> <p>9 Q. Into your -- into your organization.</p> <p>10 What was -- what was the role that she was brought</p> <p>11 into your organization?</p> <p>12 A. I think the official title we gave it</p> <p>13 was technical director of the global client team</p> <p>14 or the financial services vertical.</p> <p>15 Q. And was an informal term the -- the</p> <p>16 global client lead?</p> <p>17 A. No, it was global client technical</p> <p>18 lead. It's a slightly -- it a more technical</p> <p>19 version versus the business version.</p> <p>20 Q. Okay. So there was a global</p> <p>21 cli -- client technical lead and the global</p> <p>22 what -- what was the other --</p> <p>23 A. Sorry. There's a global client lead</p> <p>24 which was not Ulku and then there's a global</p> <p>25 client technical lead which was Ulku.</p>	<p style="text-align: right;">Page 204</p> <p style="text-align: center;">Page not submitted in support of Google's motion for summary judgment</p>
<p style="text-align: right;">Page 203</p> <p style="text-align: center;">Page not submitted in support of Google's motion for summary judgment</p>	<p style="text-align: right;">Page 205</p> <p style="text-align: center;">Page not submitted in support of Google's motion for summary judgment</p>

<p style="text-align: right;">Page 210</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 A. Okay.</p> <p>3 Q. Okay. We're going to mark this as</p> <p>4 Exhibit 44, Bates stamped GOOG-ROWE-00017643.</p> <p>5 (Whereupon, Plaintiff's Exhibit 44</p> <p>6 was marked at this time.)</p> <p>7 Q. Do you recognize this document?</p> <p>8 A. I do. It appears to be a recap of my</p> <p>9 conversation with Ulku that I provided to Kevin</p> <p>10 Lucas and Fiona, who are my HR business partners.</p> <p>11 Q. Okay, and so the first section that</p> <p>12 has the tab, are those -- does that reflect what</p> <p>13 you told Ulku in that conversation?</p> <p>14 A. To the best of my recollection, yes.</p> <p>15 Q. And so if you look at the third tab</p> <p>16 down you say, "You know, I don't expect that she</p> <p>17 would be a candidate there as on Her interviews,</p> <p>18 people were impressed with her he technical</p> <p>19 capabilities, but didn't feel that she has the</p> <p>20 necessary depth breadth of experience on the</p> <p>21 business side." Do you see that?</p> <p>22 A. I do.</p> <p>23 Q. And is that what you told Ms. Rowe</p> <p>24 was the reason that she was not selected for the</p> <p>25 position?</p>	<p style="text-align: right;">Page 212</p> <p style="text-align: center;">Page not submitted in support of Google's motion for summary judgment</p>
<p style="text-align: right;">Page 211</p> <p>1 - TARIQ SHAUKAT -</p> <p>2 A. I believe -- I believe what I told</p> <p>3 her was that we were not filling the position, but</p> <p>4 that if we were to reopen the position that this</p> <p>5 would be the reason why we would not be moving</p> <p>6 forward with her candidacy at that point.</p> <p>7 Q. And was that the reason why you</p> <p>8 wouldn't be moving forward with her candidacy?</p> <p>9 A. It was.</p> <p>10 MR. GAGE: Objection.</p> <p>11 A. Yes, it is.</p> <p>12 Q. You see that next line, "She</p> <p>13 countered that she's the best person internally</p> <p>14 and externally for the role and that you should</p> <p>15 just give it to her"? Do you see that?</p> <p>16 A. I do.</p> <p>17 Q. Do you recall her making that</p> <p>18 statement?</p> <p>19 A. I don't recall the exact words, but I</p> <p>20 recall her being fairly direct about the sentiment</p> <p>21 expressed in there, yes.</p> <p>22 Q. Was this a videoconference or an</p> <p>23 in-person meeting or Hangout?</p> <p>24 A. The -- what is written later on leads</p> <p>25 me to believe it was a videoconference when it</p>	<p style="text-align: right;">Page 213</p> <p style="text-align: center;">Page not submitted in support of Google's motion for summary judgment</p>

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2 charge of that while we figured out what the
3 long-term strategy and structure was going to be.
4 All of that said, that would have
5 been in I believe the November, 2018 time frame.
6 I don't recall exactly when in November it was.
7 It may have been late -- late October, but it was
8 in roughly that time frame.
9 Q. Okay, and the interim role that you
10 referenced, that's the head of financial services,
11 correct?
12 A. Yes, but I would just emphasize it
13 was not the job description that we were referring
14 to earlier. It was a caretaker role for the
15 existing team while we figured out what the future
16 scope was going to be for the vertical and for the
17 role.
18 Q. Was that before or after it was
19 communicated to Ms. Rowe that she would not be
20 receiving the head of financial services position
21 that you had -- that you made that decision?
22 MR. GAGE: Objection.
23 A. Can you repeat the question, please?
24 Q. Sure. The decision to put Stuart
25 Breslow in that role, did you make the decision

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2 refreshes my recollection so I'm not sure I ever
3 internalized that, but it does suggest that it was
4 a week's notice.
5 Q. Okay. You can put that aside.
6 MR. GAGE: I'm sorry, did you say
7 something, Cara?
8 MS. GREENE: I said you can put that
9 aside.
10 MR. GAGE: Okay, I didn't hear.
11 Q. When did you decide that Stuart
12 Breslow would take over the head of financial
13 services role?
14 A. Well, to -- to be precise, I don't
15 agree that I decided that he would take over the
16 head of financial services role. I asked him to
17 play an interim role while we figured out what the
18 strategy of the financial services industry
19 would be, given some of the leadership changes
20 which -- which is quite different. We put
21 as -- as a earlier e-mail indicated, we had put
22 the strat -- the vertical strategy essentially on
23 pause when Thomas Kurian came in pending his
24 blessing, for lack of a better word. So -- so I
25 very specifically asked Stuart to be interim in

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2 before or after you communicated to Ms. Rowe that
3 she would not be getting the financial services
4 vertical lead role?
5 MR. GAGE: Objection.
6 A. That would be before, as I believe
7 the e-mail previously indicated. Meaning I had
8 decided that Stuart would be the interim lead
9 before I told Ulku that we were shutting down that
10 search and if we reopened it that she would not be
11 a candidate for it in -- in the future.
12 Q. Did you consider Ms. Rowe for the
13 interim position?
14 A. I -- I did consider Ulku as a
15 potential option for the interim role.
16 Q. When did you consider her as a
17 potential option?
18 A. Roughly in the same time frame as I
19 was -- as I indicated earlier, of making the
20 decision on -- on Stuart doing that role.
21 Q. Was there anyone else you considered
22 as a possibility for the interim role?
23 A. I don't believe so. I was looking at
24 the existing team, not bringing anyone else onto
25 to the team at the -- at that point. So it would

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2 have been the two of them who got the serious
3 con -- consideration for that.

4 Q. And why did you not select Ms. Rowe?

5 A. There were two reasons. One of them
6 was -- actually, there were three reasons, I'm
7 sorry.

8 One of them was the fact that I -- I
9 mentioned we were hitting pause on the financial
10 services strategy. The one area we were
11 continuing with at the same pace because we had
12 client engagements in the area was what I was
13 referred to earlier as the [REDACTED]
14 initiative that we were focused on. That was
15 something we had a long list of customers who were
16 interested. We believed we had a differentiated
17 value proposition, et cetera and we were close
18 to having agreement from a major financial
19 institution to move forward with that. So the
20 focus was going to be almost exclusively on that
21 and the [REDACTED] as we reduced scope in
22 this holding pattern that I was -- that I'm
23 describing.

24 Stuart is a recognized authority on
25 anti-money laundering. He's, I -- I would

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2 say -- one client actually referred to him as icon
3 in the space and so he is somebody who has deep
4 knowledge of how that works, how it should work,
5 and what could be done due improve it. So there
6 was that consideration from a content standpoint.

7 There was a second consideration that
8 was from a level standpoint, that Stuart was a
9 Level 9 and Ulku was a Level 8 and Leonard the
10 other person on the team at a senior level was a
11 Level 6 or 7, I can't remember which, and it would
12 have been very unusual inside of Google to
13 have what Google refers to as an inversion.
14 Particularly on an interim basis, it would have
15 been very unusual to do that; and an inversion is
16 when you have someone at a lower level report to
17 someone at a higher level. So there was that
18 consideration that Ulku was Level 8 and Stuart was
19 Level 9 and, as I mentioned, Leonard was Level 6 I
20 think. So the second.

21 And the third, I -- I wouldn't -- I
22 -- I would characterize this one as -- as a lower
23 consideration, but I was concerned about the
24 messaging of -- or "messaging" is the wrong
25 word -- the expectations I would be setting if I

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needed in this context.

Q. Tell me how it came to be that Ms. Rowe left your organization.

A. So the prediction that she would not be happy working on the team with Stuart leading it proved to be true and she would from time to time air her frustration either to him or to me or would continue to show up in an uncoordinated way at clients where -- as I mentioned earlier, one of the things that we had asked the global client technical leads to do was to focus on a specific set of clients. It was very hard to get Ulku to show up on a consistent basis at a very specific set of clients.

We asked that she not do the level of speaking engagements that she was doing because -- this is something I asked all the team because I viewed it as a waste of time with limited resources to be traveling internationally for days or weeks to give a lot of the speeches that we were giving, et cetera.

She was expressing a lot of dissatisfaction with that and so I finally give her an option that I had not given to any of her

<p style="text-align: right;">Page 258</p> <p style="text-align: center;">- TARIQ SHAUKAT -</p> <p>1 peers who had moved over, which was that if she 2 agreed to focus -- and I -- I did this in concert 3 with Will Grannis. If she agreed to focus on -- 4 on a horizontal, as we called it, as opposed to on 5 a vertical that I would be okay with her moving 6 back into OCTO; and, again, that is an option we 7 made exclusively available to her. We didn't make 8 it available to Ben Wilson, who had some of the 9 same struggles, and we did not make it available 10 to Jeff Kember, but we did as a way to try and 11 resolve some of the issues that Ulku had.</p> <p>12 Now I'm recalling, as I'm saying 13 this, that she did ask for clarification on what 14 her options are and I believe I laid out a couple 15 of options for her, one of which was -- I -- I'm 16 trying to recall exactly, but I want to say one of 17 them was continuing building out the team around 18 the technical -- well, the client lead role or 19 global client technical lead role, I should say. 20 The second is to do more of an individual 21 contributor type of role, which had been her role 22 in OCTO at the time. Or the third is to take this 23 horizontal role in OCTO. There was some set of 24 options that I tried to craft for her so that she 25</p>	<p style="text-align: right;">Page 260</p> <p style="text-align: center;">Page not submitted in support of Google's motion for summary judgment</p>
<p style="text-align: right;">Page 259</p> <p style="text-align: center;">- TARIQ SHAUKAT -</p> <p>1 would have some ability, again more than I offered 2 any of her peers, to -- to craft a path that she 3 was happy with.</p> <p>4 She expressed some -- she had 5 expressed a point of view that -- that the options 6 I was presenting her, I don't -- I can't -- I 7 don't recall if it was all of the options or one 8 of the options would in effect be a demotion, 9 which was not the case in my opinion, and as a 10 result of that she opted to go back into OPTO 11 focusing on what is called hybrid Cloud as opposed 12 to on financial services; and she and Will reached 13 that decision independently of me. I blessed it, 14 meaning I agreed to give Will the headcount for 15 that role so he didn't have to find additional 16 budget for it, but that decision was between Ulku 17 and -- and Will.</p> <p>18 Q. Did you ever communicate to Ms. Rowe 19 that she was reporting in to Mr. Breslow? 20 A. I assume I did. I don't have a 21 recollection specifically of doing so, but I do 22 assume that I -- that I did.</p> <p>23 Q. But you don't have a recollection -- 24 A. But I --</p>	<p style="text-align: right;">Page 261</p> <p style="text-align: center;">- TARIQ SHAUKAT -</p> <p>1 Q. And it was also clear that if she 2 went back to OCTO it was in a horizontal role and 3 not a vertical role, correct? 4 A. That is correct. I was not going to 5 undo the org changes that we had made, correct. 6 Q. So she would -- she couldn't be 7 financial services focused if she went back to 8 OCTO, correct? 9 A. Correct. 10 Q. Once she moved back into OCTO, did 11 you have any other communications with her? 12 A. With her directly, I don't recall 13 any.</p> <p>14 I do recall continuing complaints 15 about her showing up in a financial services 16 capacity and causing confusion with the industry 17 team, including doing interviews in which she was 18 described as the financial services CTO and areas 19 like that that was in violation of the agreement, 20 if you will, that Will and I had had.</p> <p>21 I don't know that I ever spoke to her 22 directly about -- about that. I do remember 23 speaking to Will and their PR team and our market 24 team about it, but I don't know if I ever spoke to 25</p>

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2 transition.

3 It was clear in my conversations with
 4 Thomas that he had some changes he wanted to make
 5 to the organization, specifically as it related to
 6 industries. I had set up, as we've touched on,
 7 what I refer to as a general management structure
 8 where I had business technology, meaning product
 9 engineering, all in one place. Thomas for other
 10 parts of -- of Cloud was moving to a different
 11 model that had a -- had a -- a stronger line
 12 between technology and business. There were -- I
 13 -- I would say my team was the last one that he
 14 focused on from that standpoint, but in late 2019
 15 he and I started talking about whether it made
 16 sense to break my vertical teams up into a
 17 technical piece, meaning product and engineering,
 18 and go-to-market piece, and we decided it did.

19 And in that role, I didn't have much
 20 interest in just running the business side of it.

21 [REDACTED]
 22 [REDACTED]
 23 [REDACTED]
 24 [REDACTED]
 25 [REDACTED]

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2 [REDACTED]
 3 [REDACTED]. We -- I told Thomas I was not interested in
 4 doing a role that -- that was purely business
 5 development, not -- was not furthering my career
 6 and I wasn't interested in doing it. So I moved
 7 that part to Rob Enslin who was the president of
 8 sales at this time.

9 And then Thomas and I started
 10 thinking about other roles that I could play in
 11 Cloud. It became clear there wasn't one that met
 12 -- you know, where there was a natural need and
 13 would fulfill what I wanted to do from a career
 14 standpoint, et cetera and so then I started
 15 talking to other groups inside of Google about
 16 other roles, and COVID hit and things inside of
 17 Google slowed down, and things outside started to
 18 heat up because there was a leak that -- that I
 19 was leaving Cloud and so that resulted in a lot of
 20 inbound phone calls from people.

21 And I ended up deciding in probably
 22 June of 2020 to accept an external offer and
 23 to -- and to leave Google, which I did in July of
 24 2020.

25 Q. Did you enter into any sort of

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